

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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| In the Matter of |) | |
| |) | MB Docket 19-193, 17-105 |
| Amendments of Parts 73 and 74 |) | |
| To Improve Low Power FM Technical |) | |
| Rules |) | |

Reply Comment from KGIG-LP Modesto, California

KGIG-LP is a Low Power FM station on the edge of Modesto, California within the town of Salida. KGIG-LP was licensed as a result of the first LPFM filing window. Ever since has provided a free speech local community radio format to the area. As Chief Operator of KGIG-LP, I have also worked in the broadcast industry since the 1980s in various jobs including air talent and broadcast engineering. Community service in commercial radio, and broadcast localism has very much decayed as a result of deregulation in the early 80s, the Telecommunications Act of 1996, and elimination of the main studio rule just last year. Because of this, many folks have lost their jobs after stations were purchased by conglomerates and completely automated. I left the broadcast industry several years ago. Since commercial, and even non-commercial radio, have lost all their public interest obligations, Low Power FM has been the last forum on the dial for local community expression.

KGIG-LP supports all of the changes in rules proposed for LPFM including directional antennas, minor change moves similar to translators and full power stations (based on overlapping contours), and FM boosters. Also, a commenter mentioned the elimination of §73.870(c) -- the "sudden death" clause that prevents new LPFM applicants from amending an application. This rule only pertains to LPFM, and there appears no reason why new LPFM applicants cannot amend new LPFM applications *nunc pro tunc* like other broadcast service applicants.

Furthermore, I believe the elimination of LPFM having to protect translator second and third adjacent channels (as translators do not need to protect LPFM second and third adjacents) makes sense. When it comes to Emergency Alert Systems, anything the Commission can do to reduce the costs associated with compliance is welcomed. If LPFM stations at the same tower can legally find ways to utilize the same EAS unit (such as some consolidated broadcast outlet or cable services), that is seen as a positive thing. Also, it does not make sense that LPFM cannot use transmitters that are accepted for full service

stations. The stipulation of “certification” for LPFM should be changed in the rules to allow LPFM to use any FCC-sanctioned FM transmitter.

KGIG-LP would like to see the FCC adopt the ability for LP100 to upgrade to LP250. Reading over the rulemaking, there is no clear reason why the FCC is not taking up this issue. Within that last LPFM rulemaking, the benefits of LP250 were acknowledged, and the FCC postponed research into LP250 to a later date. The FCC insinuation that the LCRA prevents this rulemaking from taking up the subject matter is not accurate. In the LPFM Rulemaking “Fifth Order on Reconsideration and Sixth Report and Order” the FCC states that “the LCRA does not contain any language limiting the power levels at which LPFM stations may be licensed...” (paragraph 206).

The FCC has been assisting other broadcast services with their signal issues. For example, the FCC is helping current commercial Class A licensees research if they might benefit from a new Class C4 service. For AM licensees, the FCC has opened the Revitalization Rulemaking that resulted in two translator filing windows to move translators 250 miles, and another two translator filing windows for new cross-service translators. For translators, the FCC expedited a rulemaking to make it easier for translators to eliminate interference by jumping to any channel. The FCC has also tightened language that raised the bar concerning filing interference complaints (45 dBu cut-off) against translators. LPFM is the only service that has not been extended a branch for solving their weak signal issues. With only the tiny 100 watt signal LPFM service tends to have a staticy signal after the first mile. I support LP250! LPFM should have a clear signal out to the radio line of sight of its 100 foot antenna height. In practice this is 3 to 9 miles. LP250 is in the public interest bringing the voice of the community up above the background noise of today's radio environment.

KGIG-LP goes to great lengths to serve the local community, from showing up at local events, covering local government meetings, and playing local artists. Due to LPFM minimum spacing issues, we can't move into Modesto to provide a solid signal to the city. On certain days HD interference from a commercial station is noticeable on the channel. This HD signal interference has been compounded since the HD power increase.

HD radio is not a zero-sum game, it is TWO digital signal causing dirty static on your next door neighbors channel. During times of summer VHF ducting these digital static signals pollute the FM band. Remember that most FM radios were made to reject FM adjacent channel interference at a 3 to 1 ratio, but the Dirty HD signal is not really FM, it is more like AM And inflicts static at a 10 to 1 ratio and you hear the audio distortion on LPFM stations often within the first mile. Raising the power to LP250 is in the public interest. Setting a sunset date on HD radio would also be in the public interest! No one is listening.

It is unfair that ten translators--most pumping in satellite-fed programming, and others completely automated jukeboxes of commercials feeds via HD-2 signals from commercial stations (already with signals in the market)--get more clear signals and most of the best secondary service channels, and the real local stations like KGIG-LP, with roots in the community, are not offered a timely path by the FCC to strengthen its broadcast signal above the noise and deliver the goods to the listeners.

I thank the FCC for the opportunity of offering LPFM licenses to nonprofits that desire to serve community needs over the airwaves. However, I think the Commission is neglecting to provide relief for LPFM service when it has readily helped other broadcast services in the last five years concerning these same issues. I respectfully request the FCC to address these LPFM coverage issues within this docket, providing a path towards a rule change that would allow LP250. This should be the legacy of the Commissioners, strengthening local voices.

Sincerely,

Brad Johnson
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Modesto, CA